

Andrew Altschul, OSB No. 980302
E-mail: andrew@baaslaw.com
BUCHANAN ANGELI ALTSCHUL
& SULLIVAN LLP
921 SW Washington St., Suite 516
Portland, OR 97205
Telephone: 503-974-5015
Facsimile: 971-230-0337

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

BECKY WRIGHT,

Plaintiff,

v.

STANDARD INSURANCE COMPANY,

Defendant.

Civil No. 3:18-cv-1948-YY

**DECLARATION OF ANDREW
ALTSCHUL IN SUPPORT OF
DEFENDANT'S RESPONSE IN
OPPOSITION TO PLAINTIFF'S
(OPPOSED) MOTION TO REOPEN
DISCOVERY AND COMPEL A
DEPOSITION(S)**

I, ANDREW ALTSCHUL, declare under penalty of perjury as follows:

1. I am an attorney with the firm Buchanan Angeli Altschul & Sullivan LLP and I represent defendant Standard Insurance Company in the above-referenced matter. I am over eighteen years of age and I have personal knowledge of the matters set forth in this declaration.

2. I submit this Declaration in good faith in support of Defendant's Response in Opposition to Plaintiff's (Opposed) Motion to Reopen Discovery and Compel a Deposition(s).

3. On September 27, 2019 plaintiff's counsel Megan Glor left me a voicemail and sent me an email, attached as Exhibit 1, to confer on this motion. Although we had discussed the issue of which long term disability policy applied in the recent past, this was the first mention of reopening discovery.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

DATED this 28th day of October, 2019.

BUCHANAN ANGELI ALTSCHUL &
SULLIVAN LLP

/s/ Andrew Altschul

Andrew Altschul, OSB No. 980302

andrew@baaslaw.com

Telephone: (503) 974-5015

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **DECLARATION OF ANDREW ALTSCHUL IN SUPPORT OF DEFENDANT’S RESPONSE IN OPPOSITION TO PLAINTIFF’S (OPPOSED) MOTION TO REOPEN DISCOVERY AND COMPEL A DEPOSITION(S)** on the following named person(s) on the date indicated below by:

- ☐ Mailing with postage prepaid
- ☒ Notice of electronic filing through CM/ECF
- ☐ Hand delivery
- ☐ Facsimile transmission
- ☐ Email

to said person(s) a true copy thereof, addressed to her last-known address as indicated below.

Megan E. Glor
Megan E. Glor, Attorneys at Law
707 NE Knott Street, Suite 101
Portland, OR 97212
megan@meganglor.com

Attorneys for Plaintiff

DATED this 28th of October, 2019.

BUCHANAN ANGELI ALTSCHUL &
SULLIVAN LLP

/s/ Andrew Altschul
Andrew Altschul, OSB No. 980302
andrew@baaslaw.com
Telephone: (503) 974-5015

Attorneys for Defendant